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July 3, 1991

Mr. Frazer Lockhart  
U. S. Department of Energy  
Trailer 130A  
P. O. Box 928  
Golden, Colorado 80402

**RE: COMMENTS; DRAFT WORKPLAN FOR CONTROL OF RADIONUCLIDE  
LEVELS IN WATER DISCHARGES FROM THE ROCKY FLATS PLANT,  
APRIL 5, 1991**

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G. The Division's comments, supported by those of the Rocky Flats Program Unit and Radiation Control Division, are attached.

The referenced document cannot be approved in its present form. The most serious issues are:

- o The workplan must not be a forum for debating the virtue of discharge limits set by the Colorado Water Quality Control Commission (CWQCC). It is, however, the proper forum for demonstrating control procedures, analytical methods, and treatment technologies that will allow discharges in compliance with radionuclide levels established by CWQCC. References to Derived Concentration Guides (DCGs) are irrelevant in the context of this document. As DOE is aware, the CWQCC statewide and site specific standards for radionuclide levels in ground and surface waters are currently being re-evaluated; a Commission hearing on these standards is scheduled for February, 1992.
- o The document, as written, may be better described as a report rather than as a plan-of-work. The approved document must adequately define the tasks and sequence of events Rocky Flats Plant will follow in controlling the release of water.

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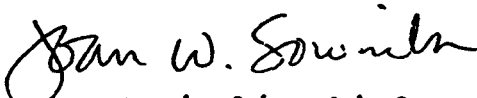
**ADMIN RECORD**

- o Analytical methodologies and equipment must be upgraded to reliably establish radionuclide concentration levels, in compliance with CWQCC stream standards, whether water is released as treated or untreated effluent.
- o The information on treatability studies needs to be expanded. Currently the documentation on the existing treatment system is inadequate. The "minimally effective" efficiency of the current system, reported in the workplan, must be supported.
- o Concentrations of plutonium are statistically higher for Pond C-2 water and Pond C-2 betas are above standards for Woman Creek. Consequently, it is appropriate that DOE focus more on the Pond C-2 effluent and the treatment technologies applicable to these constituents.

For these and other reasons discussed in the attachments, the Division requires substantial revision of the plan before we can approve the document.

If you have any questions concerning these comments, please call Harlen Ainscough of my staff at 331-4977.

Sincerely,



Joan Sowinski, Chief  
Hazardous Waste Control Section  
Hazardous Materials and Waste Management Division

Attachments (3)

cc: Daniel S. Miller, AGO  
Martin Hestmark, EPA  
Bonnie Lavelle, EPA  
Tom Greengard, EG&G ✓  
Barbara Barry, RFP  
Judy Bruch, RFP  
Debbie Mauer, RFP  
Jeb Love, RFP